

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

STICHTING PENSIOENFONDS ABP,

Plaintiff,

v.

ALLY FINANCIAL INC. et al.,

Defendants.

Case No. 12-cv-1381 (ADM) (TNL)

**PLAINTIFF'S MOTION FOR
LEAVE TO AMEND THE
COMPLAINT**

Pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure, Plaintiff Stichting Pensioenfond ABP ("Plaintiff") hereby moves the Court for leave to amend Plaintiff's original Complaint in the above-captioned action in conformity to Exhibit A of the supporting Declaration of Geoffrey C. Jarvis ("Jarvis Decl."). The reasons justifying such amendment are more fully set forth in the attached memorandum in support, which has been filed contemporaneously herewith. Pursuant to the District of Minnesota's Local Rule 15.1, a redline comparing the proposed amended complaint to the party's original pleading is also attached to the Jarvis Decl. as Exhibit B.

DATED: October 24, 2012

GRANT & EISENHOFER P.A.

/s/ Geoffrey C. Jarvis

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